

Miller, Paul

From: Bunker, Kelly <Bunker.Kelly@epa.gov>
Sent: Wednesday, July 08, 2015 4:06 PM
To: Baggett, Steve
Cc: Dickens, Aquanetta
Subject: Re: Former Fueling Facility Amtrak Wilmington Shops (DE-0266) Planned Car Shop Relocation Building (Pole Barn) Project RI Work Plan

Hi Steve - I left you a voice message. Thanks for explaining the conduit/cap and providing the response below, this is a good start.

Please provide additional details regarding the conduit and the cap in the submittal clearly indicating that the conduit will be laid prior to the cap being poured and detailing the diameter of the conduit that will be coming through the cap and

stating that the conduit opening will be sealed and that any repairs required for the wiring, etc will not require the breaching of the cap.

Please submit an amendment to the ACS 64 building submittal which provides these details for that cap as well.

Thank you.

Kelly

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bunker.kelly@epa.gov

From: Baggett, Steve <Steve.Baggett@stantec.com>
Sent: Wednesday, July 8, 2015 2:31 PM
To: Bunker, Kelly
Subject: RE: Former Fueling Facility Amtrak Wilmington Shops (DE-0266) Planned Car Shop Relocation Building (Pole Barn) Project RI Work Plan

Great, I am off my call and you can reach me on my office # - 610-840-2538.

Steve Baggett, PG
Principal Hydrogeologist
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Cell: (610) 704-1223

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From: Bunker, Kelly [mailto:Bunker.Kelly@epa.gov]
Sent: Wednesday, July 08, 2015 2:07 PM
To: Baggett, Steve
Subject: RE: Former Fueling Facility Amtrak Wilmington Shops (DE-0266) Planned Car Shop Relocation Building (Pole Barn) Project RI Work Plan

No, I will call you as I am working from home today.

From: Baggett, Steve [mailto:Steve.Baggett@stantec.com]
Sent: Wednesday, July 08, 2015 2:06 PM
To: Bunker, Kelly
Subject: RE: Former Fueling Facility Amtrak Wilmington Shops (DE-0266) Planned Car Shop Relocation Building (Pole Barn) Project RI Work Plan

I'm on a call right now but can call you shortly, hopefully by 2:30. Should I use your office #?

From: Bunker, Kelly [mailto:Bunker.Kelly@epa.gov]
Sent: Wednesday, July 08, 2015 1:55 PM
To: Baggett, Steve
Subject: RE: Former Fueling Facility Amtrak Wilmington Shops (DE-0266) Planned Car Shop Relocation Building (Pole Barn) Project RI Work Plan

Hi Steve – Can I call you sometime between now and 3 pm to talk?

From: Baggett, Steve [mailto:Steve.Baggett@stantec.com]
Sent: Wednesday, July 08, 2015 12:46 PM
To: Bunker, Kelly
Cc: Aceto, Frank; Miller, Paul; Dickens, Aquanetta; 'Enzman, Andrew'
Subject: RE: Former Fueling Facility Amtrak Wilmington Shops (DE-0266) Planned Car Shop Relocation Building (Pole Barn) Project RI Work Plan

Hello Kelly,

Thank you for your comments. We will address your comments in a revised and final plan (Revised Plan) to be submitted around the time of your return from vacation (approx. July 23). We wanted to provide you with the discussion below of our preliminary approach to how we will address each comment before you leave for vacation tomorrow. I would especially like to talk to you about comment #3 and how this Pole Barn project (OU-2) fits in with the larger Former Fueling Facility project (DE-0266) being performed under the Delaware VCP.

Your thoughts would be greatly appreciated.

Thank you,

Steve

Steve Baggett, PG

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From: Bunker, Kelly [mailto:Bunker.Kelly@epa.gov]

Sent: Tuesday, July 07, 2015 3:12 PM

To: Baggett, Steve

Cc: Aceto, Frank; Miller, Paul; Dickens, Aquanetta; 'Enzman, Andrew'

Subject: RE: Former Fueling Facility Amtrak Wilmington Shops (DE-0266) Planned Car Shop Relocation Building (Pole Barn) Project RI Work Plan

Thank you for opportunity to review the draft Notification and Certification of Self-Implementing Cleanup and Disposal of PCB Remediation Waste for the Car Shop Relocation Building, Amtrak Wilmington Maintenance Facility. EPA's comments are as follows:

1. Page 8 of the draft plan states that soil borings were taken along the perimeter building footing. The plan states that the perimeter soil samples were collected from 0.5 feet to 2.5 feet below the bottom of the asphalt but fails to indicate what portion of that interval was analyzed. Table 1 indicates only one sample for each of the perimeter samples, suggesting compositing of the entire 0.5 to 2.5 foot interval thereby diluting the sample. 40 CFR 761.265 and 286 require core samples having a diameter of ≥ 2 cm and ≤ 3 cm and a maximum depth of 7.5 cm. The samples collected along the perimeter of building footprint at the planned building footer locations, were collected using a hand auger between depths of 0.5 to 2.5 feet below grade and likely included some degree of compositing due to collapsing and sloughing of the borehole. For the those locations, we will collect additional samples immediately adjacent to each location, from a 7.5 cm interval between 2.0 and 2.5 feet bgs using a different sample collection technique. This data will be included in the Revised Plan and the description of management of excavated soils will be adjusted accordingly, if needed. The interior samples collected at a depth of 0.5 were discrete samples and additional sampling is not needed in these locations.
2. 40 CFR 761.65(c)(9) allows for the temporary onsite stockpiling of excavated soils for up to 180 days if specific requirements are met. The proposed stockpiling described on page 10 of the draft plan does not comply with those requirements. 40 CFR 761.65(c)(1) provides for 30 day temporary onsite storage of excavated soils that are in PCB containers. PCB container is defined in 40 CFR 761.3. For the purposes of 40 CFR 761.65(c)(1), a roll off bin can be used if the top is covered with a water proof material at all times except when adding soil to the roll off. We will be submitting a Stormwater Plan in accordance with DNREC regulations. The Stormwater Plan will include a detail depicting a temporary soil staging area that will include the placement of a liner on the ground surface throughout the stockpile area, the liner will extend over Jersey barriers placed around the perimeter of the soil staging area in order to prevent storm water run-on or run-off from the stockpile area, and a liner will be secured over the stockpiles to prevent migration through wind or storm water. There will be a truck tire washing pad and water handling/treatment equipment to manage water that may collect within the stockpile area or within the truck tire wash pad. The controls will be maintained throughout the project in accordance with 40 CFR 761.65(c)(9). The Stormwater Plan will be attached to the Revised Plan.

3. Page 10 of the draft plan states that soils will be excavated horizontally from around a portion of grid node CSR-L-5. This is unacceptable. The horizontal excavation must be conducted entirely around grid node CSR-L-5. As agreed upon with DNREC, the building footprint has been designated as OU-2 under the Former Fueling Facility (DE-0266) Voluntary Cleanup Program (VCP) project. As such, the excavation will extend horizontally in all directions which are within the OU-2 footprint. The area surrounding the OU-2 footprint is included in the DE-0266 project which is currently being investigated. This 761.61a Plan is intended only for the OU-2 area as the area outside of the building footprint will be remediated in accordance with the selected final remedy for the Former Fueling Facility VCP project being conducted under the direction of DNREC and EPA.
4. Please provide the name of the Subtitle D landfill where the less than 50 ppm PCB soils will be disposed. The Revised Plan will identify the selected Subtitle D landfill.
5. Page 11 of the draft plan proposes a 6 inch asphalt or concrete cap and states that all penetration of the cap (i.e. piping, electrical, tec.) will be performed in a manner that does not interfere with the integrity of the cap. Penetration of the cap impairs the integrity and is not allowable. Clean corridors, meeting the high occupancy requirement of less than or equal to 1 ppm PCBs, may be constructed for all piping, electrical, etc. The clean corridors must be large enough to accommodate any future repair work needed, and must be marked with a warning layer, such as a geosynthetic liner having a PCB M_L label, at their boundaries. We will review the construction drawings for the building and include specific details of how this will be addressed in the Revised Plan. The concrete cap would not be penetrated after placement; allowance for any openings for utility conduits would be pre-formed in concrete and then sealed. We will consider the installation of concrete lined utility chases would also serve as a cap or the practicality of clean corridors depending on review and discussion with Amtrak on the building utility design. The Revised Plan will address this issue.
6. Pages 11 and 12 of the draft plan state that "post excavation sampling will be conducted in accordance with 40 CFR 761 Subpart O. If the construction schedule allows, prior to excavation pre-sampling will be conducted in accordance with Subpart O and utilized as verification sampling". Subpart O sampling must be completed to verify completion of the cleanup and therefore must be conducted after excavation of soils NOT prior to excavation. Verification sampling will be performed after excavation; the text will be revised accordingly.
7. 40 CFR 761.61(a)(3)(i)(D) requires that the cleanup plan include options and contingencies to be used if unanticipated higher concentrations or wider distributions of PCB remediation waste are found. The draft plan lacks this information. This information will be included in the Revised Plan.

Please contact me if you have any questions.

Kelly Bunker

Environmental Scientist

U.S. Environmental Protection Agency

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bunker.kelly@epa.gov

From: Baggett, Steve [mailto:Steve.Baggett@stantec.com]

Sent: Tuesday, July 07, 2015 10:05 AM

To: Bunker, Kelly

Cc: Aceto, Frank; Miller, Paul; Dickens, Aquanetta; 'Enzman, Andrew'

Subject: RE: Former Fueling Facility Amtrak Wilmington Shops (DE-0266) Planned Car Shop Relocation Building (Pole Barn) Project RI Work Plan

Kelly,

Thanks for your attention to this.

Please call my cell at 610-704-1223 should you have any questions during your review.

Steve

From: Bunker, Kelly [mailto:Bunker.Kelly@epa.gov]

Sent: Tuesday, July 07, 2015 9:56 AM

To: Baggett, Steve

Cc: Aceto, Frank; Miller, Paul; Dickens, Aquanetta; 'Enzman, Andrew'

Subject: RE: Former Fueling Facility Amtrak Wilmington Shops (DE-0266) Planned Car Shop Relocation Building (Pole Barn) Project RI Work Plan

Hi Steve – I am reviewing the draft today and will have comments to you by the end of the day.

Thank you.

Kelly Bunker

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From: Baggett, Steve [mailto:Steve.Baggett@stantec.com]

Sent: Wednesday, July 01, 2015 2:29 PM

To: Bunker, Kelly

Cc: Aceto, Frank; Miller, Paul; Dickens, Aquanetta; 'Enzman, Andrew'

Subject: RE: Former Fueling Facility Amtrak Wilmington Shops (DE-0266) Planned Car Shop Relocation Building (Pole Barn) Project RI Work Plan

Hello Kelly,

As I mentioned in my voice message earlier today, if it would help with your review efforts, we could meet at your convenience next week to discuss this project. I'm not sure what Kyle has in the files that he gave you but just so you aware, the Draft 761.61 (a) Plan we submitted is only for the proposed Pole Barn Building footprint (approximately 65 feet x 110 feet). Everything outside of the building footprint will be addressed under the ongoing DNREC VCP project at the facility in conjunction with EPA.

If you are unable to provide comments to the Draft Plan by July 9, we are considering resubmitting the Draft Plan as final in an attempt to meet the construction schedule constraints and since we believe the Pole Barn project is relatively straightforward.

Thank you for your efforts,

Steve

Steve Baggett, PG

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From: Bunker, Kelly [mailto:Bunker.Kelly@epa.gov]
Sent: Wednesday, July 01, 2015 10:30 AM
To: Baggett, Steve
Cc: Aceto, Frank; Miller, Paul; Dickens, Aquanetta
Subject: Re: Former Fueling Facility Amtrak Wilmington Shops (DE-0266) Planned Car Shop Relocation Building (Pole Barn) Project RI Work Plan

Hi Steve - Unfortunately I will be unable to provide comments by July 6.

I just received the historical files for this site from Kyle and I have had to take several days off because I was effected by the straight line storms in Gloucester County, NJ. I am on vacation beginning July 9 and will be returning July 23. If I have the opportunity before July 9 I will review the submittal but otherwise I will look at it upon my return.

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From: Bunker, Kelly
Sent: Thursday, June 11, 2015 11:19 AM
To: Baggett, Steve
Cc: Aceto, Frank; Miller, Paul; Dickens, Aquanetta
Subject: RE: Former Fueling Facility Amtrak Wilmington Shops (DE-0266) Planned Car Shop Relocation Building (Pole Barn) Project RI Work Plan

Hi Steve – I will respond by July 6, 2015 with comments.

Thank you.

Kelly Bunker

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From: Baggett, Steve [<mailto:Steve.Baggett@stantec.com>]

Sent: Thursday, June 11, 2015 10:21 AM

To: Bunker, Kelly

Cc: Aceto, Frank; Miller, Paul

Subject: FW: Former Fueling Facility Amtrak Wilmington Shops (DE-0266) Planned Car Shop Relocation Building (Pole Barn) Project RI Work Plan

Hello Kelly,

In follow-up to the phone message that I left you this morning, here is the e-mail that I previously sent to Kyle. I understand that you will be working with us on this Amtrak project. We are looking to see if EPA has any comments to the Draft 761.61a plan before we submit the final plan for review.

Please let me know if you have any questions.

Thanks,

Steve

Steve Baggett, PG

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From: Baggett, Steve

Sent: Thursday, May 28, 2015 2:05 PM

To: 'Chelius, Kyle'

Cc: 'Cargill IV, John G. (DNREC)'; Miller, Paul; Aceto, Frank

Subject: RE: Former Fueling Facility Amtrak Wilmington Shops (DE-0266) Planned Car Shop Relocation Building (Pole Barn) Project RI Work Plan

Hello Kyle,

Attached is the Draft 761.61 (a) Plan for the Car Shop Relocation Building to be constructed at the Amtrak Wilmington Maintenance Facility later this summer. A hard copy is also being sent to you and John Cargill (DNREC).

As we've previously discussed, this is a Draft of the Plan to see if you have any concerns. I think this one is pretty straight-forward. We will follow-up with the final/formal submittal once we hear from you.

Thanks,
Steve

Steve Baggett, PG

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From: Chelius, Kyle [mailto:Chelius.Kyle@epa.gov]
Sent: Monday, March 30, 2015 10:04 AM
To: Baggett, Steve
Cc: Greene, Richard W. (DNREC); Miller, Paul; Aceto, Frank; Cargill IV, John G. (DNREC); Prince, Ruth; Dickens, Aquanetta; Bunker, Kelly
Subject: RE: Former Fueling Facility Amtrak Wilmington Shops (DE-0266) Planned Car Shop Relocation Building (Pole Barn) Project RI Work Plan

Steve –

Currently, the intent is to have me stay with PCBs for some select projects, Amtrak being one of them.

Thank you,

From: Baggett, Steve [mailto:Steve.Baggett@stantec.com]
Sent: Monday, March 30, 2015 8:50 AM
To: Chelius, Kyle
Cc: Greene, Richard W. (DNREC); Miller, Paul; Aceto, Frank; Cargill IV, John G. (DNREC)
Subject: RE: Former Fueling Facility Amtrak Wilmington Shops (DE-0266) Planned Car Shop Relocation Building (Pole Barn) Project RI Work Plan

Good Morning Kyle,

I left you a voice-mail this morning but I wanted to follow-up to make sure that you will still be the contact person at EPA for 761.61 (a) plan submittal. As indicated in the e-mail below that was sent to DNREC, Amtrak plans to construct a new slab on-grade building (to be referred as the Car Shop Relocation Building) within the Outfall 007 drainage area at the Amtrak Wilmington Maintenance Facility. The Car Shop Relocation Building construction is planned for late summer 2015.

Amtrak plans on following the same regulatory process as was followed for the planned ACS-64 Locomotive Test/Warranty Building. In addition to collecting soil samples in order to complete a Remedial Investigation Report under the DNREC VCP project, we are also collecting soil samples for PCB analyses per EPA/TSCA Self-Implementing PCB Remediation [761.61(a)] soil characterization guidelines. Once this data is received from the laboratory and compiled, Amtrak will submit a Draft Self-Implementing PCB Remediation Plan to EPA. After EPA provides comments to the Draft Plan, Amtrak will submit a Final Plan for formal EPA review.

We wanted you to be aware of this forthcoming project and that a Draft 761.61(a) plan will be sent to you, likely in late April.

Your voice mail greeting suggested that you are working on lead abatement projects, so we wanted to verify that you will still be our contact for the 761.61(a) plan review process. If you are no longer the contact person, please let us know.

Thanks,
Steve

Steve Baggett, PG

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From: Baggett, Steve
Sent: Thursday, March 26, 2015 4:17 PM
To: Cargill IV, John G. (DNREC)
Cc: Greene, Richard W. (DNREC); 'Chelius, Kyle'; Miller, Paul; Aceto, Frank
Subject: Former Fueling Facility Amtrak Wilmington Shops (DE-0266) Planned Car Shop Relocation Building (Pole Barn) Project RI Work Plan

John,

In follow-up to our discussion on March 16, 2015, Amtrak plans to construct a new slab on-grade building (to be referred as the Car Shop Relocation Building) within the Outfall 007 drainage area at the Amtrak Wilmington Maintenance Facility. The Car Shop Relocation Building construction is planned for late summer 2015. The proposed building location is depicted on the attached drawing.

Amtrak plans on following the same regulatory process as was followed for the ACS-64 Locomotive Test/Warranty Building (note the ACS-Building has not yet been constructed, construction is planned for later this year; a construction schedule will be provided to DNREC and EPA when available). Amtrak will be performing soil sampling activities to comply with the requirements of EPA/TSCA Self-Implementing PCB Remediation [761.61(a)] soil characterization guidelines and will perform a remedial investigation under the VCP for the Former Fueling Facility (DE-0266). The Car Shop Relocation Building will be considered Operable Unit 2 (OU-2) for the purposes of the VCP.

The planned building is approximately 110' x 65'. The building will be constructed slab-on grade. Material (mostly asphalt and stone sub-base) will be removed to a depth of approximately 0.5 feet throughout the

building footprint and there will be excavation to a depth of approximately 2.5 ft. along the perimeter of the building for footers. Groundwater will not be encountered during excavation activities.

Consistent with DNREC's request for soil sample collection for the ACS-64 Locomotive Test/Warranty Building (per DNREC's 2/24/2014 e-mail), Amtrak will collect the following samples requested by DNREC:

- 1) Two soil borings within the footprint of the proposed building. At each of these soil boring locations, representative samples will be collected in two foot vertical intervals from beneath the concrete or asphalt cover to immediately above the water table (approximately 4 ft. below ground surface) in order to characterize the soil beneath the proposed building, and
- 2) Eight soil borings within a buffer outside of the footprint will be advanced in a buffer area outside of each of the four sides of the proposed building footprint (two samples per side of the proposed building). These soil borings will be targeted to be within 10 feet of the proposed footprint but may need to be adjusted slightly based on physical site constraints. At each of these soil boring locations, representative samples will be collected in two foot vertical intervals from beneath the concrete or asphalt cover to immediately above the water table in order to characterize the soil outside the footprint of the proposed building.

Also,

- 1) Each sample for the DNREC-requested soil sampling mentioned above will be analyzed for TCL/TAL constituents,
- 2) Sample analyses will be performed by Lancaster Laboratories (a DNREC HSCA/VCP certified lab), and
- 3) Upon receipt of the laboratory data, Amtrak will provide DNREC with the tabulated data and a sample location map. A letter-format report (to serve as the Remedial Investigation Report) will be prepared in follow-up to the summarized data submittal.
- 4) On December 5, 2014, DNREC published the Policy for Polychlorinated Biphenyl (PCB) Analysis Method (issued November 24, 2014). In that policy, DNREC adopts the use of EPA Method 680 (PCB Homologs) as the standard method for confirmatory analyses of PCBs for HSCA sites. In addition, EPA Method 8082 (PCB aroclors) and EPA Method 1668 (PCB congeners) are included in the policy. The investigation at the Amtrak Wilmington Former Fueling Facility (DE-0266) as well as the Wilmington Maintenance Facility (DE-0266) have been ongoing for many years, prior to DNREC publishing the above referenced policy. PCB aroclors, homolog and congener analyses have been analyzed for various media, and reported accordingly. As such, DNREC's policy for Polychlorinated Biphenyl (PCB) analysis is accommodated by both historical PCB sample analyses, ongoing investigations and the additional investigations described in previous reports.

We are also collecting soil samples for PCB analyses per EPA/TSCA Self-Implementing PCB Remediation [761.61(a)] soil characterization guidelines. Once this data is received from the laboratory and compiled, Amtrak will submit a Draft Self-Implementing PCB Remediation Plan to EPA. After, EPA provides comments to the Draft Plan, Amtrak will submit a Final Plan for formal EPA review. I have copied Kyle Chelius (EPA) on this e-mail and will follow-up with him directly.

Please let me know if there any questions or concerns with our sampling approach.

Thanks,

Steve

Steve Baggett

Principal Hydrogeologist

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